

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

August 10, 1995

IN REPLY REFER TO:

Mr. Raul R. Rodriguez
Mr. Stephen D. Baruch
Leventhal, Senter & Lerman
2000 K Street, N.W., Suite 600
Washington, D.C. 20006
Attorney for Starsys Global Positioning, Inc.

Gentlemen:

This is in reply to your Comments and Comments on Amended Application filed by STARSYS Global Positioning, Inc., regarding the experimental applications of Final Analysis, Inc. (FAI), Reference File Nos. 4682 through 4684-EX-PL-95 for a nonvoice, nongeostationary orbit mobile satellite system (NVNG-MSS) experiment.

Since your initial filing, FAI has made several amendments to its applications, the latest filed on June 19, 1995. This letter deals only with issues that have not been made moot by the FAI amendments.

The number of remote terminals proposed by FAI has been reduced in its amendments from 9,240 to 1,848. FAI has indicated that this would provide one remote terminal per 100,000 pops. We believe that a reasonable number of remote terminals are needed to fully test the satellite uplink and to investigate sharing of spectrum with the terrestrial land mobile service. We are authorizing FAI to operate up to 350 terminals. In addition, in accordance with Section 5.206, all transmitting and receiving equipment must be owned by FAI and may not be sold to the public participating in the experiment.

STARSYS objects to FAI's use of the downlink channel 400.620 MHz due to potential interference to its use of the same channel in the proposed STARSYS NVNG-MSS system. However, STARSYS has not yet been granted a license for its system and has no satellites in operation. FAI has indicated that it would cease operation on this frequency if interference were eventually to be caused to the STARSYS system. FAI has also indicated in its application amendment of June 19, 1995, that the FAI experimental satellite transmitter will have the capability of operating over the 401-404 MHz range, which has been proposed by the U.S. for allocation to the NVNG-MSS at WRC-95. We are conditioning the FAI experimental license to indicate to FAI that it would have to cease operation on 400.620 MHz or submit an application for modification of its experimental system upon the launch of the first STARSYS satellite that utilizes this frequency.

Mr. Raul R. Rodriguez
Mr. Stephen D. Baruch

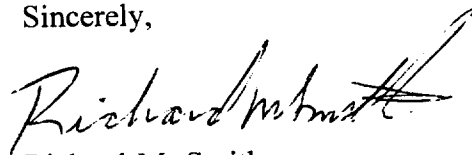
2.

STARSYS expressed concern that the satellite and terminals proposed by FAI are fully programmable and capable of a broad range of commercial operation. However, we believe that the use of equipment with a broad range of capabilities has the potential to provide much information about the NVNG-MSS environment and is consistent with an experimental program.

Finally, STARSYS expressed concern that FAI's application to modify the authority previously granted to operate a ground station, license number KE2XGU, would violate the condition on that license, which restricts it to operations in support of specific Government contracts. FAI has changed this application from a request for modification of an existing license to a request for a new authorization. This eliminates the policy problem raised by STARSYS.

It is our belief that with the amendments and additional justification provided by FAI, the proposed experiment is appropriate and we are granting FAI its requested authority with the modifications indicated above.

Sincerely,



Richard M. Smith
Chief
Office of Engineering and Technology

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IN REPLY REFER TO:

Ms. Jill Abeshouse Stern
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037
Attorney for CTA Commercial Systems, Inc.

Dear Ms. Stern:

This is in reply to your Opposition to Experimental Applications and Opposition to Amendment of Experimental Applications filed by CTA Commercial Systems, Inc. regarding the experimental applications of Final Analysis, Inc. (FAI), Reference File Nos. 4682 thru 4684-EX-PL-95 for a nonvoice, nongeostationary orbit mobile satellite service (NVNG-MSS) experiment.

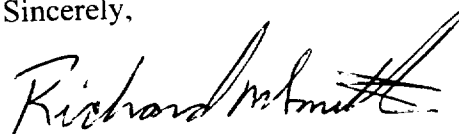
The FCC does not have any provision in its rules for the consideration of Oppositions to experimental applications filed under Part 5 of the rules. Therefore, your filing is being considered as comments on the applications.

Since your filing, FAI has made several amendments to its applications, the latest filed on June 19, 1995. This letter deals only with issues that have not been made moot by the FAI amendments.

The number of remote terminals proposed by FAI has been reduced by FAI in its amendments from 9,240 to 1,848. FAI has indicated that this would provide one remote terminal per 100,000 pops. The FCC believes that a reasonable number of remote terminals are needed to fully test the uplink and to investigate sharing of spectrum with the terrestrial land mobile service. We are authorizing FAI to operate up to 350 terminals. In addition, in accordance with Section 5.206, all transmitting and receiving equipment must be owned by FAI and may not be sold to the public participating in the experiment.

It is our belief that with the amendments and additional justification provided by FAI, the proposed experiment is appropriate and we are granting FAI its requested authority with the modifications indicated above.

Sincerely,



Richard M. Smith
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